

Serial No. 10/719,017

REMARKS

Claim 6 has been amended in a sincere attempt to overcome the rejection thereof under the first paragraph of 35 USC 112. The word "permanently" has been changed to "fixedly", a term supported by the specification at page 8, lines 8 to 12, in which the last phrase of the sentence appearing there reads "each holding member 6 is fixed onto a plate member 12 individually with screws." If, upon consideration of the change and the discussion related thereto, the Examiner believes that another term is more appropriate, the Examiner is requested to telephone the undersigned.

The rejection of claims 4 to 6 and 8 to 10 under 35 USC 102 as allegedly anticipated by Aoyama et al. '134, newly cited, is respectfully traversed.

The Examiner is thanked for presenting analysis on pages 2 to 4 of the Office Action regarding how, in the Examiner's view, various elements in the reference are linked to the features of the present claims. Applicant respectfully disagrees with the characterization of tying member 12 in the reference as a plate

Serial No. 10/719,017

member. The related disclosure in the reference shows a normally-loose tying with a plastic rope or plastic, and there is no suggestion in the reference of using a plate member for rigid and unrotatable connection such as shown in instant Fig. 2 and recited in the claims. The rejection should be withdrawn.

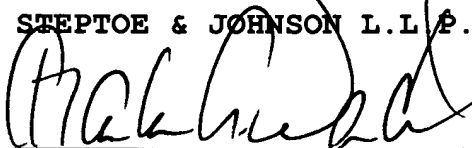
The rejection of claims 11 and 12 under 35 USC 103 as unpatentable over Aoyama et al. '134 in view of Austin '080 is respectfully traversed. The undersigned believes that the initial discussion is not that of Aoyama et al. '134 but Paw et al. '486, due to the element numbers mentioned therein. It is respectfully submitted that the combination is improper because the primary reference is directed to a system for transporting line post insulators on pallets for use and assembly at a different location; see, for example, the discussion in the patent at column 1 under the Description of the Related Art, the paragraph bridging columns 1 and 2, the first paragraph under the Summary of the Invention section, and column 5, lines 47 to 51. The primary reference is directed to a transportation system, while Austin '080 relates to an in-place arrangement. The Aoyama et al. '134 assembly is broken down for placement of the

Serial No. 10/719,017

line post insulators on a wood pole shown in Austin '080. There is no proper suggestion in the references of forming a structure as claimed here. It is believed that a person of ordinary skill in the art would have no reason, absent the hindsight provided by the instant application, to combine the references. Accordingly, the rejection should be withdrawn.

In view of the foregoing revisions and remarks, it is respectfully submitted that the application is in condition for allowance, and a USPTO paper to those ends is earnestly solicited. The Examiner is requested to telephone the undersigned if additional changes are required in the case prior to allowance.

Respectfully submitted,
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